

AO 91 (Rev. 11/11) Criminal Complaint

United States Court
Southern District of Texas
FILED

APR 30 2016

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

RIDWAN OLAYINKA AJIBODE

Case No.

H16-655 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 04/29/2016 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC Sec. 1343

Wire Fraud (affecting a financial institution)

18 USC Sec. 1546

Passport Fraud

This criminal complaint is based on these facts:

See Attached Affidavit of US Postal Inspector Matthew S. Boyden

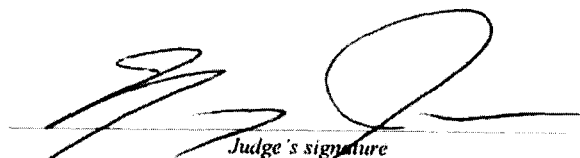
☒ Continued on the attached sheet.


Complainant's signature

US Postal Inspector Matthew Boyden
Printed name and title

Sworn to before me and signed in my presence.

Date: 04/30/2016


Judge's signature

City and state: Houston, Texas

US Magistrate Judge Nancy K. Johnson
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. Affiant, United States Postal Inspector Matthew S. Boyden, has been employed by the U.S. Postal Inspection Service since January 2000. Affiant is currently assigned to the Major Fraud team in Houston, Texas. Prior to that, Affiant served as a lieutenant of police for a municipal police department in Texas. Affiant has served in the U.S. Air Force as a Law Enforcement Specialist and criminal investigator for the Air Force Office of Special Investigations. Affiant has received specialized training in numerous Postal crimes, but primarily those involving “identity theft” and mail fraud related offenses. Affiant has attended training in the areas of check fraud, credit card fraud, and identity takeover schemes. Affiant has investigated hundreds of cases involving fraud, identity theft, and related “white collar” types of offenses. Affiant is authorized to obtain and execute Federal Arrest and Search Warrants. This Affidavit is made in support of a criminal complaint filed against Nigerian National **RIDWAN OLAYINKA AJIBODE**.
2. The information set forth in this Affidavit is based upon your Affiant’s personal knowledge and/or information provided to Affiant by other law enforcement agents and officers, witnesses, bank investigators, and cooperating individuals Affiant believes to be reliable and credible. Because this Affidavit is being submitted for the limited purpose of supporting a criminal complaint, Affiant has not included each and every fact concerning this investigation. Affiant has set forth only the facts believed to establish probable cause that **RIDWAN OLAYINKA AJIBODE** (AJIBODE) has committed violations of federal law.
3. For the past several months Affiant has been investigating a series of fraud complaints involving individuals in Houston and elsewhere that utilize counterfeit foreign passports to

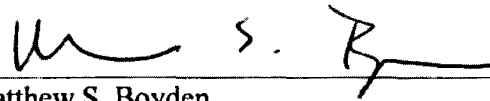
open domestic bank accounts which are used to receive the proceeds of various types of fraud schemes and scams.

4. On April 28th, 2016, Renee Thilman (Thilman), a First National Bank Texas fraud investigator, contacted Affiant regarding a fraudulent account at her bank. She stated that on March 24th, 2016, an individual (later identified at AJIBODE) opened an account in the name "Brendon Oprah" using a European Union United Kingdom of Great Britain and Northern Ireland passport #724918265. The address used to open the account was 8100 Maplecrest Dr. #2722, Houston, TX 77072.
5. On April 28th, 2015, Thilman was informed of three different wire fraud attempts that were intended for aforementioned "Brendan Oprah" account. On April 28th, 2016, Thilman received a telephone call from Isaac Kinard. Kinard is a controller for Emissary out of Atlanta, Georgia. Kinard stated his company's email was hacked. After that they received a fraudulent internal email request to send a wire in the amount of \$34,515 to Brendon Oprah's account at Thilman's bank.
6. On April 28th, 2016, Thilman received a telephone call from a representative of Private Bank of Buckhead (GA). They indicated that one of their commercial account customers had their email system hacked and compromised. They also received a fraudulent internal email request to send a wire in the amount of \$68,515 to Brendon Oprah's account at Thilman's bank.
7. On April 28th, 2016, Thilman received a telephone call from a representative of Nucompass Mobility Company (CA). They indicated their email system had been hacked and compromised. They received a fraudulent internal email request to send a wire in the amount of \$68,000 to Brendon Oprah's account at Thilman's bank.

8. On April 29th, 2016, Thilman contacted “Brendan Oprah” about the incoming wire transfers. He stated the wires were coming from his business contacts as well as one from his mother. Later the same day he was detained by local law enforcement after entering the First National Bank Texas branch located inside an HEB at 10100 Beechnut, Houston, Harris County, Texas 77072. “Oprah” attempted to retrieve the funds from the wire transfers as well as deposit an \$8,500 Wells Fargo Bank check drawn on the account of TRAVION MACAULAY. “Brendan Oprah” was in possession of the actual passport that was used to open the account. He provided that to local law enforcement when asked to identify who he was.
9. Affiant responded and interviewed the suspect. Prior to questioning, the defendant was advised of his Miranda rights both orally and in writing. He initially continued to identify himself as Brendon Oprah but provided a different spelling and date of birth than what was on the passport. He ultimately admitted opening the Brendon Oprah account in order to receive the proceeds of fraud schemes. He also admitted providing his picture to others who made the counterfeit passports. He also admitted using a different passport to open the TRAVION MACAULAY account at Wells Fargo Bank. The defendant admitted the Wells Fargo Account was also funded with a fraudulent wire transfer deposit. **AJIBODE** stated he was doing this for other people but knew he was committing fraud. He was able to provide Affiant with his real Nigerian Passport #A03612880 in the name **RIDWAN OLAYINKA AJIBODE**. Affiant also identified several other fraudulent accounts opened by the defendant at other financial institutions.
10. Affiant has conducted multiple database checks which revealed the European Union United Kingdom of Great Britain and Northern Ireland passport #724918265 is not a valid travel

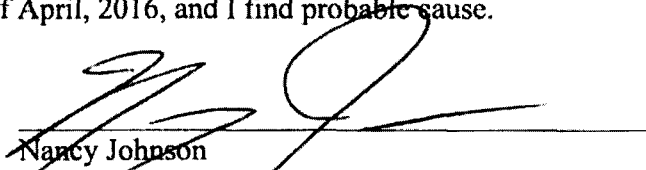
document in the U.S. There is no record of a U.S. visa associated with the passport required for admittance into the U.S. Fraud prevention features from known exemplars for legitimate passports are not present on the passport seized from the defendant.

11. Based upon the above, the undersigned believes there is probable cause to believe that **RIDWAN OLAYINKA AJIBODE** has committed crimes in violation of Title 18, United States Code, Sections 1343 and 1546.



Matthew S. Boyden
United States Postal Inspector

Sworn and Subscribed to me this 30th day of April, 2016, and I find probable cause.



Nancy Johnson
United States Magistrate Judge
Southern District of Texas